

# **EXHIBIT A**

**KLINE & SPECTER, P.C.**

By: Thomas R. Kline, Esquire/Attorney I.D. No. 28895  
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(215) 772-1000  
Attorneys for Plaintiffs

IN THE COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

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IN RE: PELVIC MESH LITIGATION	:	FEBRUARY TERM 2014
	:	
	:	
	:	
MASTER DOCKET	:	NO. 829

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ELLA EBAUGH and MARVIN  
EBAUGH

v.

ETHICON WOMEN'S HEALTH AND  
UROLOGY, A DIV. OF ETHICON,  
INC., et al

COURT OF COMMON PLEAS  
PHILADELPHIA COUNTY

JULY TERM, 2013

NO. 00866

**SECOND AMENDED NOTICE OF VIDEOTAPED *DE BENE ESSE*  
DEPOSITION OF BRUCE ROSENZWEIG, MD**

PLEASE TAKE NOTICE that counsel for Plaintiffs herein will take the videotaped *de bene esse* testimony of Bruce Rosenzweig, MD on July 14, 2017 and July 15, 2017 at 9:00 AM at JW Marriott Chicago, 151 W Adams St, Chicago, IL 60603.

The deposition will be taken before a Notary Public or other officer authorized by law to administer oaths. The deposition will be recorded by stenographic means or court reporter, and the deposition will be recorded by video and audio means. You are invited to attend and cross-examine.

This deposition will be taken pursuant to the Pennsylvania Rules of Civil Procedure and will continue from day to day until completed.

**KLINE & SPECTER, PC**

Dated: June 26, 2107

by:

A handwritten signature in blue ink, appearing to read 'TKline', is written over a horizontal line.

Thomas R. Kline, Esquire

Shanin Specter, Esquire

Lee B. Balefsky, Esquire

Christopher A. Gomez, Esquire

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on the date indicated below, foregoing Notice of Videotape *De Bene Esse* Deposition of Bruce Rosenzweig, MD was served via electronic mail to the following counsel:

**COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND JOHNSON &  
JOHNSON**

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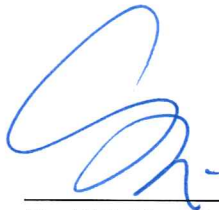
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Dated: June 26, 2107



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Cori Maldonado